

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
REPLY IN SUPPORT OF ITS MOTION
TO COMPEL PRODUCTION OF
WITHHELD DOCUMENTS AND
EXHIBITS THERETO**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Its Reply in Support of its Motion to Compel Production of Withheld Documents and
8 Exhibits Thereto, filed concurrently herewith (the “Administrative Motion”). The Administrative
9 Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply in Support of its Motion to Compel Production of Withheld Documents	Highlighted Portions	Defendants ¹ (blue highlighting)
Exhibits 9-11 of the Declaration of Patrick Schmidt (“Schmidt Decl.”)	Entire Documents	Defendants

14
15 3. Waymo seeks to seal information designated by Defendants as confidential or
16 attorneys’-eyes-only information. Waymo expects Defendants to file one or more declarations to
17 support the sealing of this information.

18
19 I declare under penalty of perjury under the laws of the State of California and the United
20 States of America that the foregoing is true and correct, and that this declaration was executed in San
21 Francisco, California, on May 16, 2017.

22 By /s/ Lindsay Cooper
23 Lindsay Cooper
24 Attorneys for WAYMO LLC
25

26 ¹ Defendants refers to Uber Technologies, Inc. (“Uber”), Ottomotto LLC (“Ottomotto”), and
27 Otto Trucking LLC (“Otto Trucking”) collectively.
28

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven